

Before the Federal Communications Commission:

In the matter of CG Docket No. 02-311 .

October 12, 2002

To the Commissioners:

My name is Paul J. Graziani and I happen to be totally blind. I am commenting on the matter of CG Docket No. 02-311 as a consumer.

Although Section 255 was an excellent regulatory start for "Access to Telecommunications Service, Equipment, and Customer Premises Equipment by Persons with Disabilities" , the telecommunication industry's response to this critical need has been less than enthusiastic. I further understand that the telecommunications industry has had greater priorities in recent years such as enriching corrupt senior executives and bilking stockholders, thus placing the making of consumer items more accessible to the disabled, especially the blind, a very low priority. I wish to cite two specific personal experiences to emphasize the need for continuance of section 255.

In October 1999, the state of Arkansas Department of Information systems began the installation of a telephone system through a private contractor AllTel Incorporated of Little Rock, Arkansas.

Although the telephones were rich in features which the sighted user would find very convenient and useful in their work, few if any of these features were accessible to blind employees.

I wrote a letter to my immediate supervisor expressing my concerns related to this matter of inaccessible features to the blind. My supervisor and the director of my department took this matter up with the Department of Information Systems. I was informed that there was currently no way to make the product accessible due to the type of switch AllTel was using. (Some type of Nortel switch.) Due to the large number of buttons on the individual telephone sets, I requested Braille labeling or overlays and was assured that I would receive them. That was three years ago. I have yet to see any Braille identifiers.

Other blind employees of the state requested that research be done by AllTel and the Department of Information Systems. The two entities asked for a time line of six months to do this research. To this date, 2 and one half years later, there has been no known feedback to any of us. Furthermore, I received direct and indirect pressure from entities which I will not name not to file a Section 255 complaint.

My second experience is as follows. I have begun recently to research cellular phones to purchase for my personal use. Although I have found many cellular phone vendors ready to sell me phones rich in features which I cannot independently access, I have found almost no phone at this time which has more than a bare minimum of features that are accessible at a near equivalent price for equivalent phones that can be used by sighted persons.

I would conclude by stating that there is indeed a need for the continuance of the Section 255 regulation because, by and large, the telecommunications industry has ignored it. Furthermore, I would suggest that the Commission make a greater effort to provide information to organizations of the blind in this country and encourage these organizations to disseminate this information to their membership. Many persons who are blind still are not aware of their rights and remedies under Section 255. If the Commission were to receive more legitimate complaints from consumers who are blind, the telecommunications industry might make this matter more of a priority.

Submitted by,

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